

Plaintiffs Paul Anderson, *et al.*

**ARGUMENT IN RESPONSE TO PROPOSED
CONGRESSIONAL AND LEGISLATIVE REDISTRICTING
PLANS**

Congressional Plans

Anderson Plan Preserves Communities of Interest

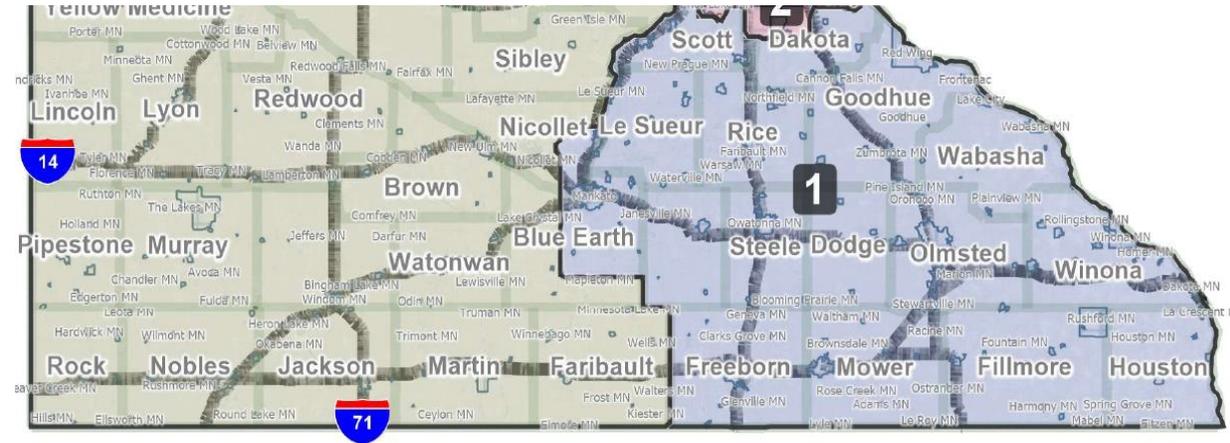
- Each of the parties perform relatively equally regarding population deviation, measures of compactness, and minority representation.
- Key differentiating factors:
 - Other parties drastically depart from current map.
 - Anderson Plan has highest average core of prior district retention of any plan – 96%.
 - Other parties dilute rural interests to an unjustifiable degree.
 - Extent to which Anderson Plan preserves political subdivisions and, relatedly, communities of interest.
- Anderson Plan preserves the unique interests of rural, suburban/exurban, and urban Minnesotans and minimizes political subdivision splits.

First Congressional District Corrie and Sachs Plans

SACHS



CORRIE



First Congressional District Corrie and Sachs Plans

- Differences between southwest and southeast Minnesota do not justify dramatic departure from current boundaries
- Regions share common interests in manufacturing, especially computer and electronic products
- Regions also share agricultural interests, such as the farming of hogs, corn, and soybeans
- Both Corrie and Sachs Plans divide these interests
- Corrie plan dilutes voices of rural Minnesotans; combines primarily agricultural interests of First district with parts of the metropolitan counties of Scott and Dakota

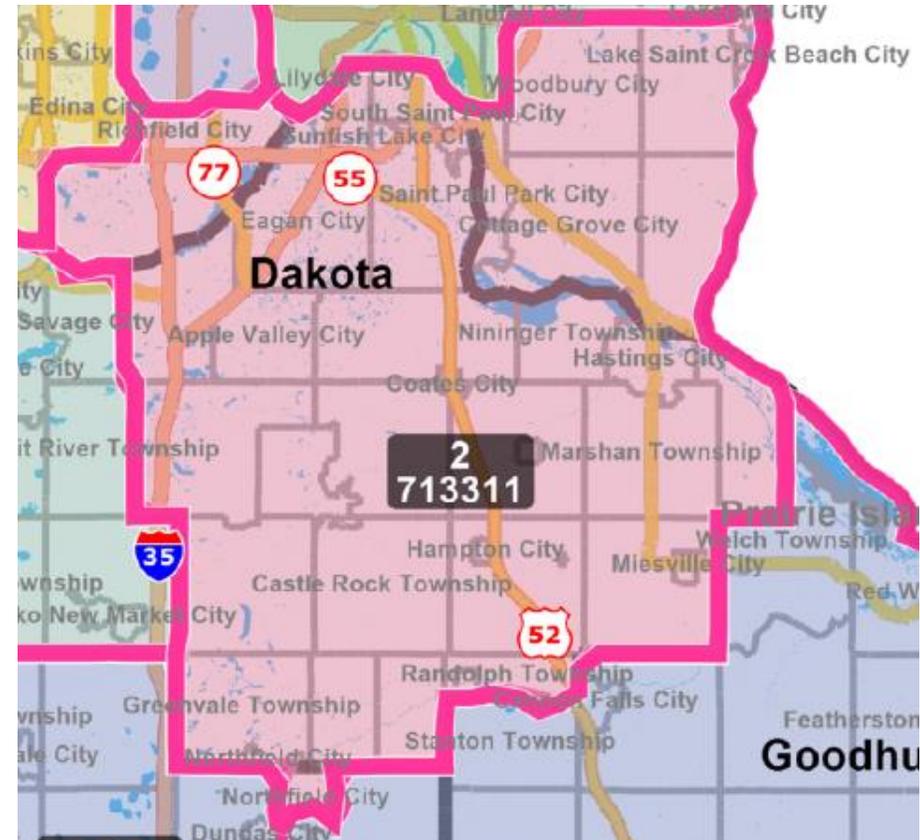
First Congressional District Wattson Plan

- Like the Anderson Plan, the Wattson Plan generally maintains boundaries of current First District
- But, unlike the Anderson Plan, ignores testimony that Wabasha should be placed in the First District due to its connections to and shared infrastructure with Rochester
- Also ignores testimony that Northfield should remain in the Second District because of the strong connections that Northfield's colleges have to the southern suburbs of the Twin Cities
- Ignores common interest that Wabasha County has with southeast Minnesota in addressing region's distinctive Karst geology



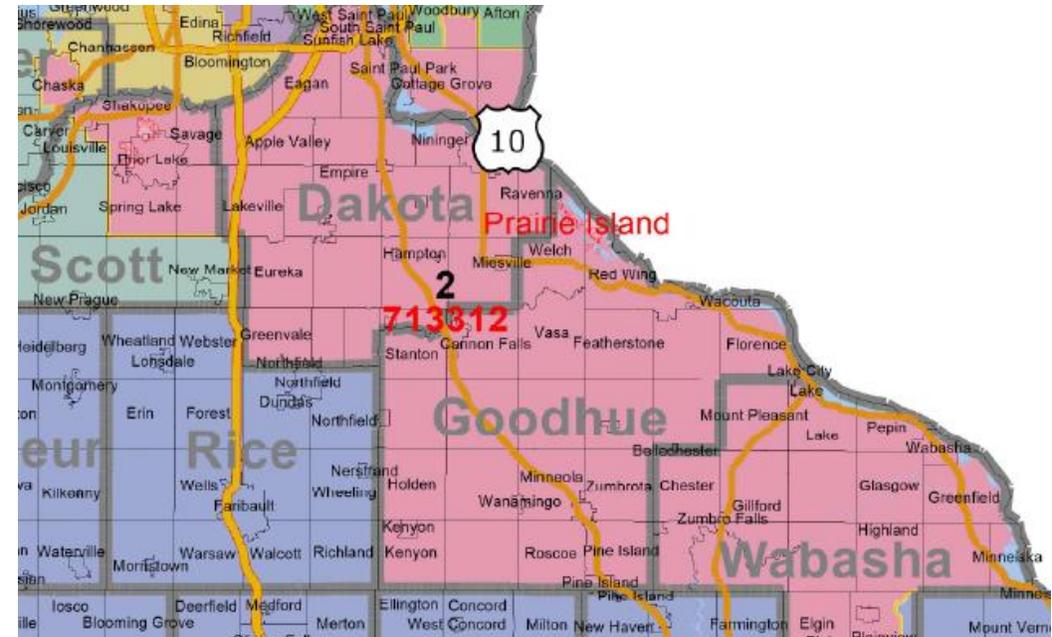
Second Congressional District Sachs Plan

- Crosses Minnesota River to pick up Richfield and Bloomington, which have more in common with south Minneapolis than the cities such as Hastings and Hampton
- Splits the St. Croix River Valley Region
- Divides the city and township of Northfield



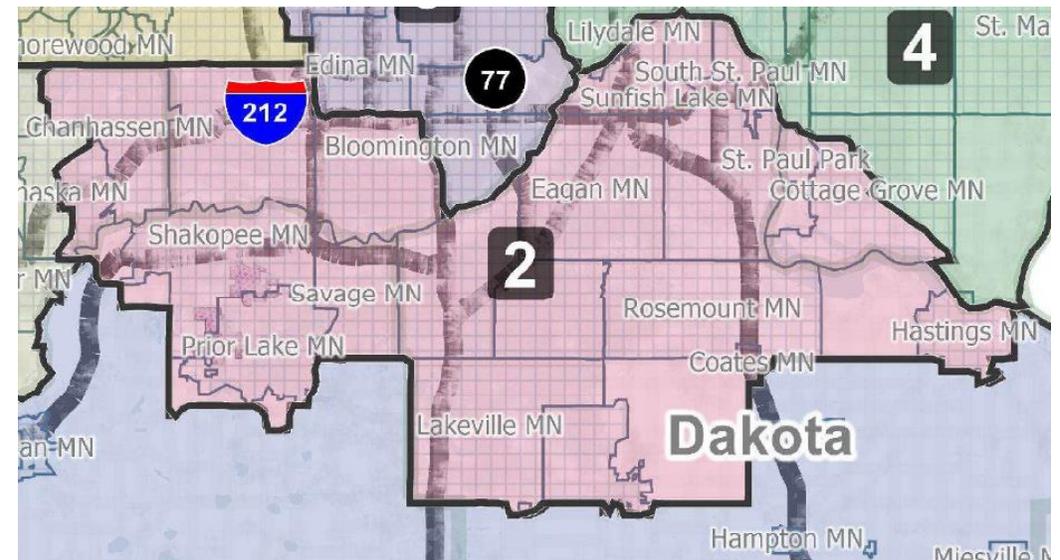
Second Congressional District Wattson Plan

- Unnecessarily includes a tail that crosses the Minnesota river solely for the purpose of splitting the city of Chaska
- Unnecessarily splits Scott County
- Unnecessarily splits neighboring communities



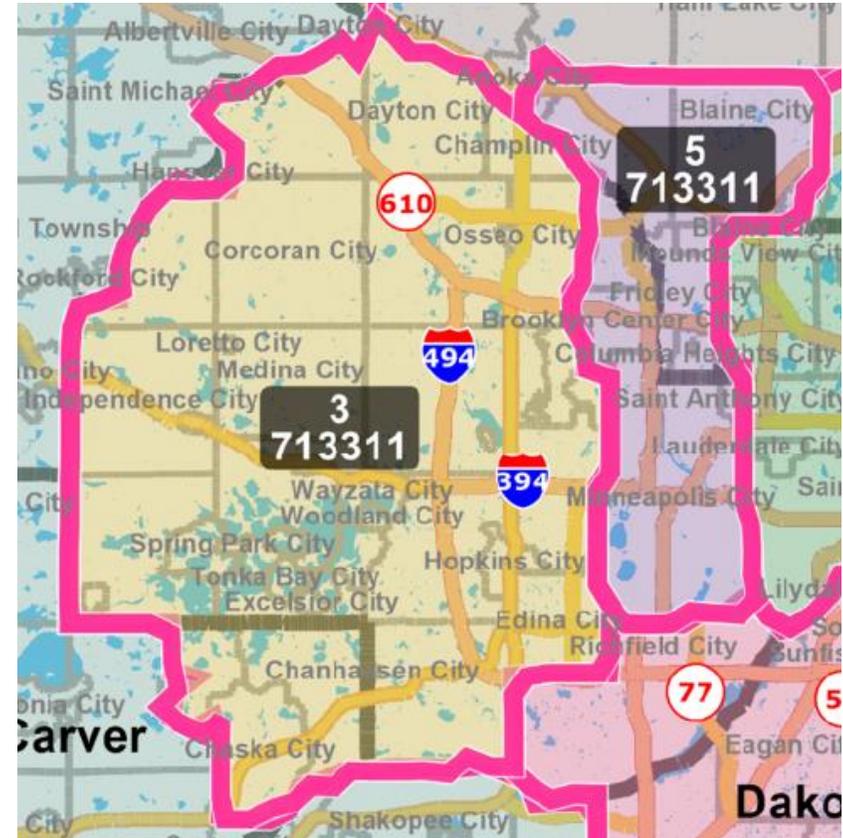
Second Congressional District Corrie Plan

- Splits Eden Prairie from communities in Third District with which it has common interests
- Unusual district configuration requires balancing the population of the Second District by moving portions of the suburban Scott and Dakota counties into the primarily rural First District



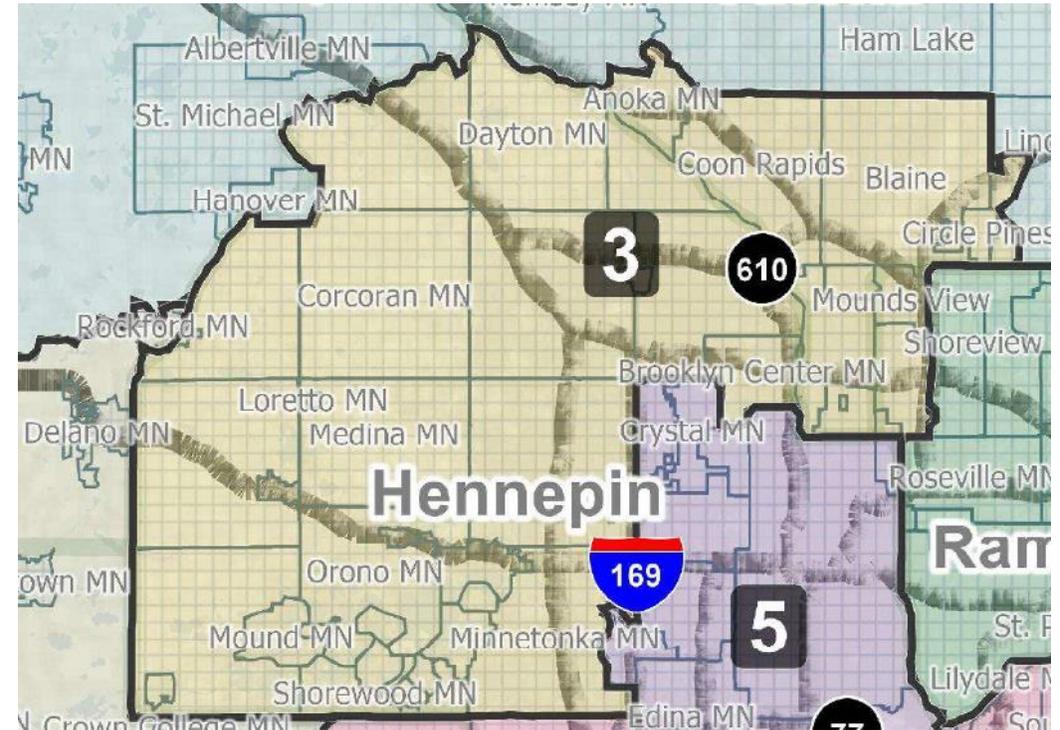
Third Congressional District Sachs Plan

- Moves first-ring suburbs out of the Fifth District into the Third District
- Compensates for moving out first ring suburbs by adding outer-ring suburbs to urban Fifth District
- Changes motivated by partisan interests



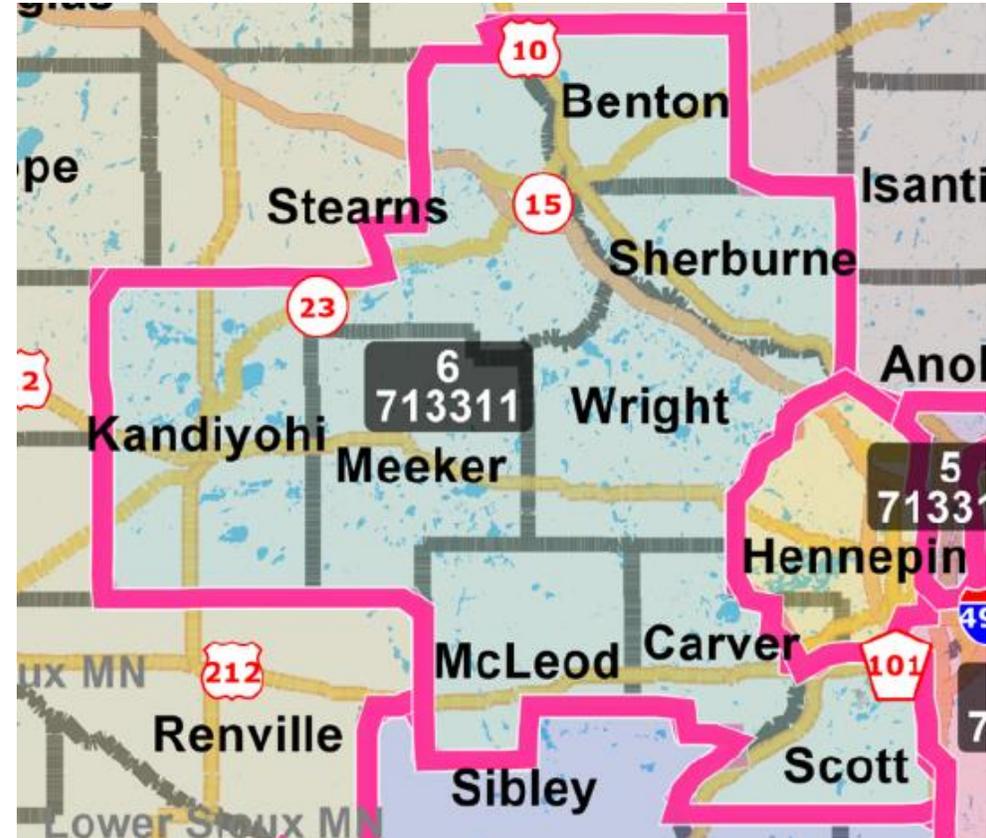
Third Congressional District Corrie Plan

- Dramatic deviation from current map
- Inexplicably moves several Ramsey County suburbs from the Fourth and Fifth Districts to the Third
- Does not result in significantly better minority representation



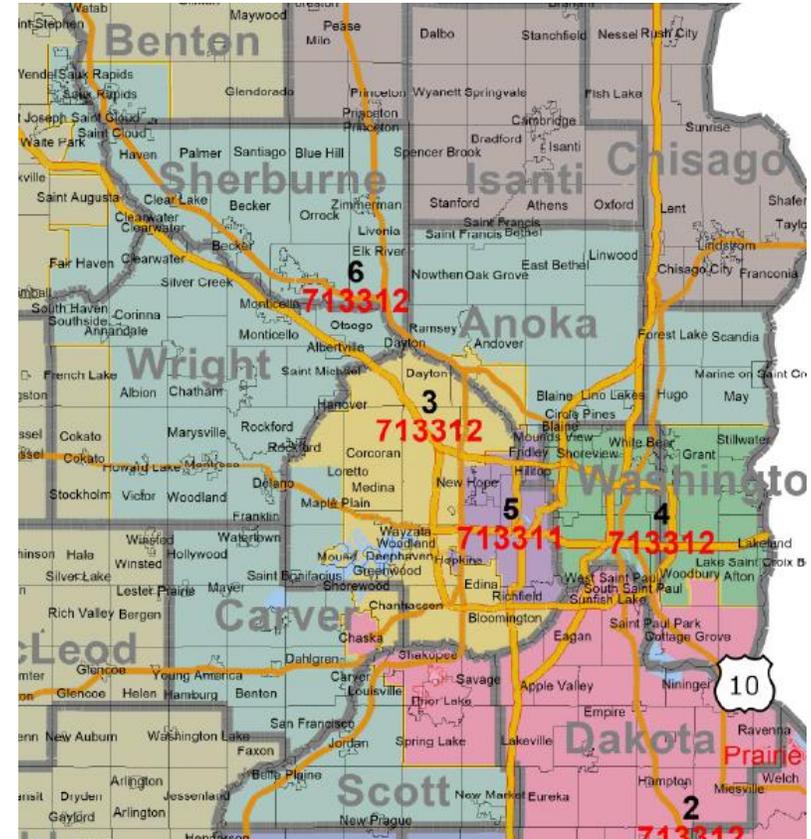
Sixth Congressional District Sachs Plan

- Also unnecessarily blends rural and central MN with south and west suburban/exurban interests



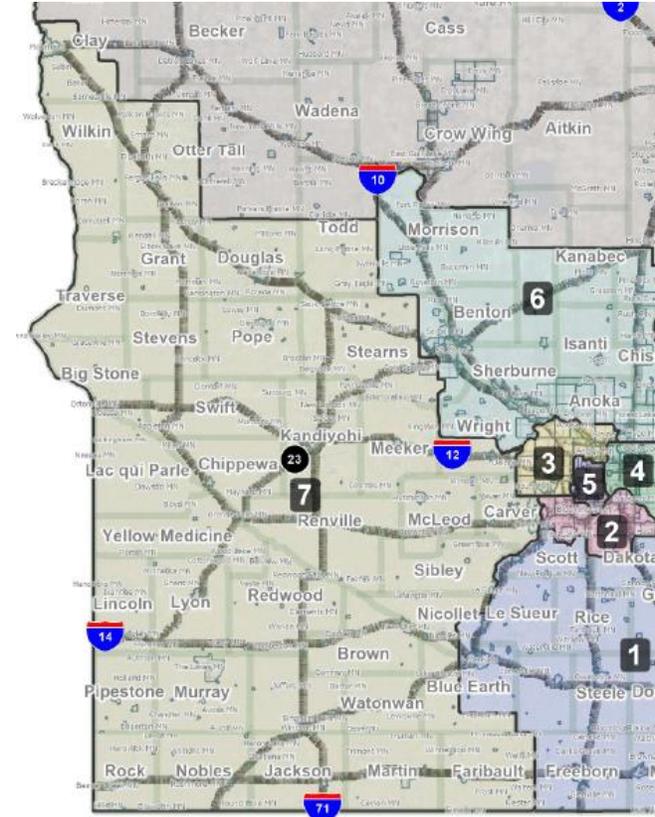
Sixth Congressional District Wattson Plan

- Splits Wright, Scott, and Carver Counties
- Carver County is split into four separate districts
- A mere three Carver County residents are placed within the Seventh District



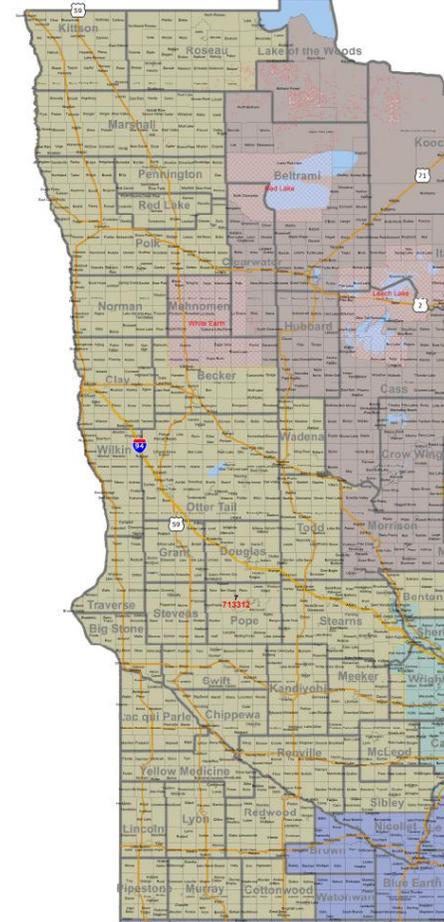
Seventh Congressional District Corrie Plan

- Like First District, splits community of interest that naturally arises in southern Minnesota along Interstate 90
- Dramatic changes fails to substantively achieve Corrie Plaintiffs' stated goals



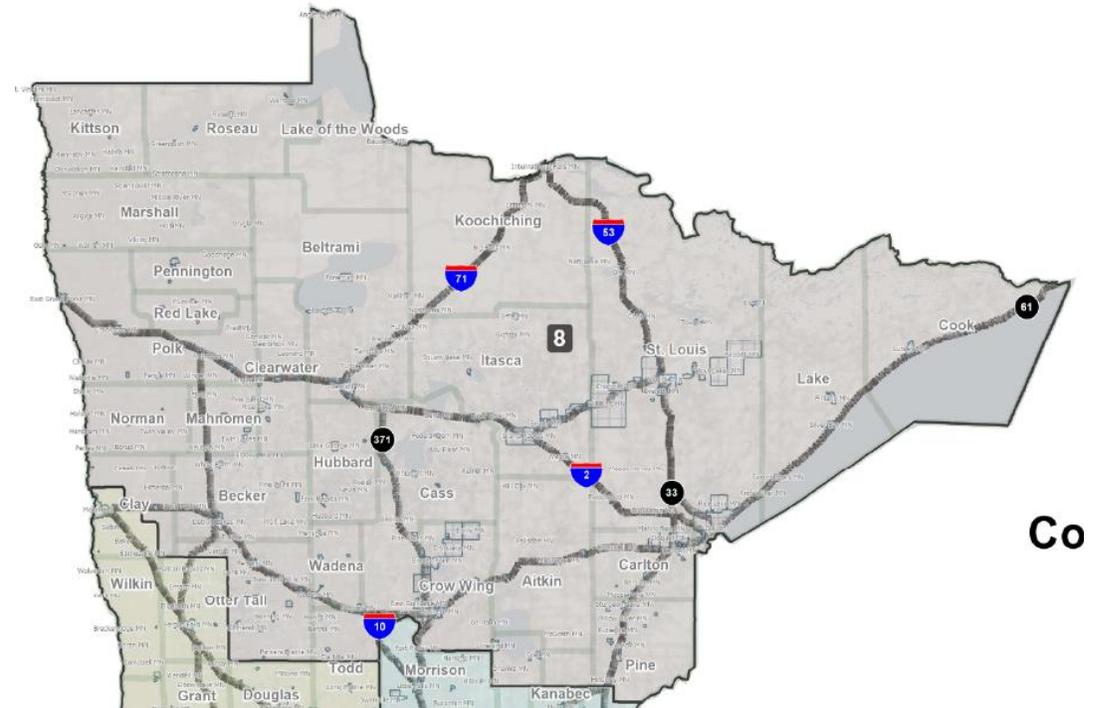
Seventh Congressional District Wattson Plan

- Includes northwestern counties of Lake of the Woods, Beltrami, Clearwater, Mahnommen, and parts of Becker in the Seventh District
- Fails to preserve distinct communities of interest in northwestern and northeastern Minnesota



Eighth Congressional District Corrie Plan

- Spans northern half of the state
- Rejected by *Hippert* a decade ago; land area to capture population has only increased.
- Ignores public testimony regarding unique communities in northeast and northwest
- Inconvenient and not easily accessible



Eighth Congressional District Sachs Plan

- Dilutes voice of rural Minnesotans
- Extends southern boundary of Eighth District south to encompass parts of Anoka County in 11-county metro



Legislative Plans

Compliance With The Panel's Principles Is Required

- “Political subdivisions must not be divided more than necessary to meet constitutional requirements.” 11/18/21 Panel Order at 5, ¶ 6 (citing Minn. Stat. § 2.91, subd. 2).
- Rejected proposals to elevate communities of interest above political subdivisions
 - Communities of interest to be preserved only “whenever possible to do so in compliance with the preceding principles” (11/18/21 Panel Order at 7, ¶ 7), which include the preservation of political subdivision
 - Panel did not adopt a requirement that voting precincts be preserved
 - Panel rejected Wattson’s proposed adoption of a principle requiring the consideration of partisanship reports, past election results, and competitiveness

Principles With Which All Parties Comply

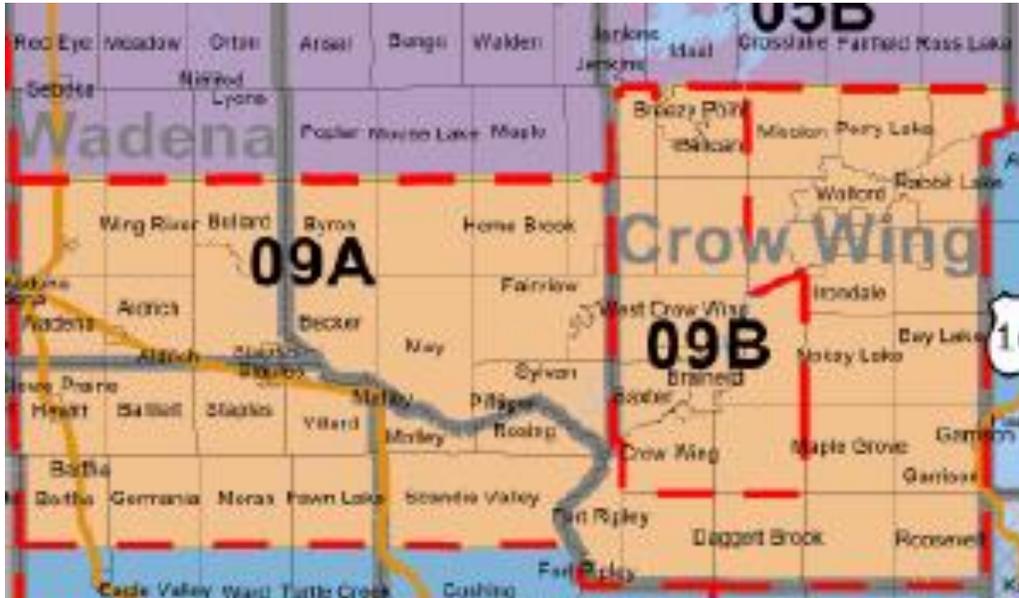
- No party exceeds a population deviation of 2%
- All parties comply with the Voting Rights Act
- Contiguous American Indian Reservation boundaries are preserved to the extent possible
- Districts are convenient and contiguous
- Districts proposed are largely compact

Wattson Plan Fails To Comply With The Panel's Criteria

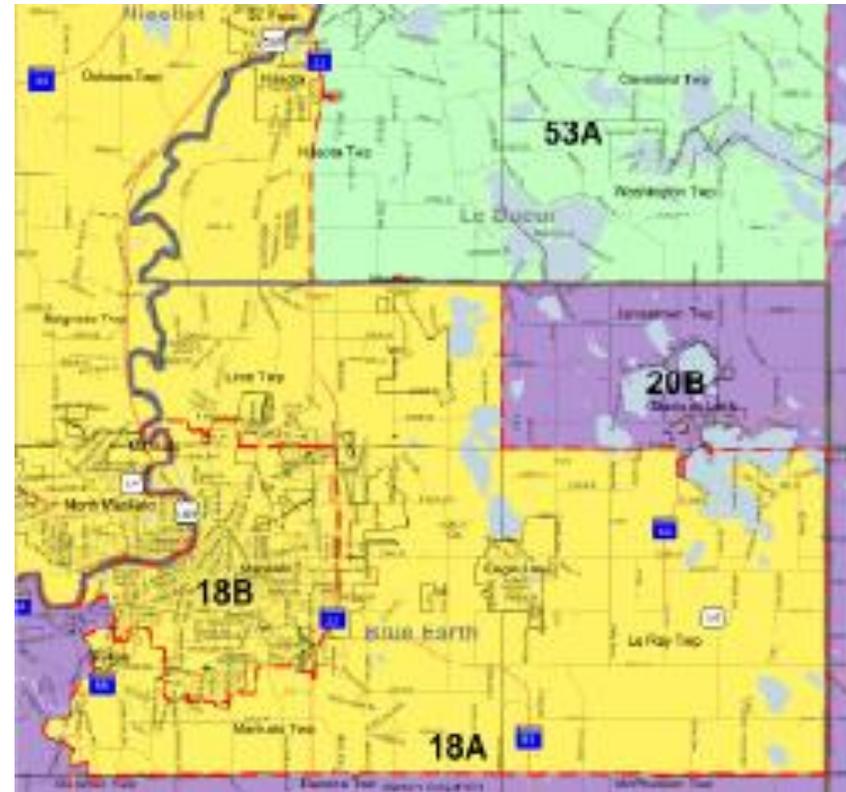
- Focused on preserving precincts at the expense of preserving political subdivisions
- Divides 35% more counties and 69.8% more cities and towns than Anderson in drawing house districts
- Divides 36% more counties and 22.5% more cities and towns than Anderson in drawing senate districts
- Unnecessarily splits the populations of twelve townships
- Devotes significant amount of its briefing to the evaluation of past election results, partisanship indexes, and partisan competitive advantage

Wattson Plan's Rejection of the Panel's Criteria Results in Oddly Shaped Districts

Wattson House Districts 9A and 9B



Wattson House Districts 18A and 18B



Corrie Plan Fails to Comply With the Panel's Criteria

- “The Corrie Plaintiffs’ Redistricting Plans focus on preserving communities of interest” Corrie Response Mem. at 2.
- “In addition, where counties are split, splits are done for good reason (*to preserve communities of interest* and protect minority voting rights). *Id.* at 12 (emphasis added).
- “In fact, in light of the dramatic population changes in Minnesota over the last decade, the current county and city lines are not (necessarily) an accurate indication of where communities of interest, including Minnesota’s BIPOC communities reside.” *Id.*
- Splits 35% more counties and 323.3% (or more than three times) more cities and townships than Anderson in drawing house districts
- Splits 39.4% more counties and 316.1% (or more than three times) more cities and townships than Anderson in drawing senate districts
- Splits the population of fifty-three townships

Corrie Plan Fails to Materially Increase Minority Representation

- The main justification provided for the Corrie Plan's oddly shaped districts and failure to preserve political subdivisions is to increase minority representation.
- But, overall, the Corrie Plan does not succeed in materially increasing minority representation compared to the other parties, including the Anderson Plan.

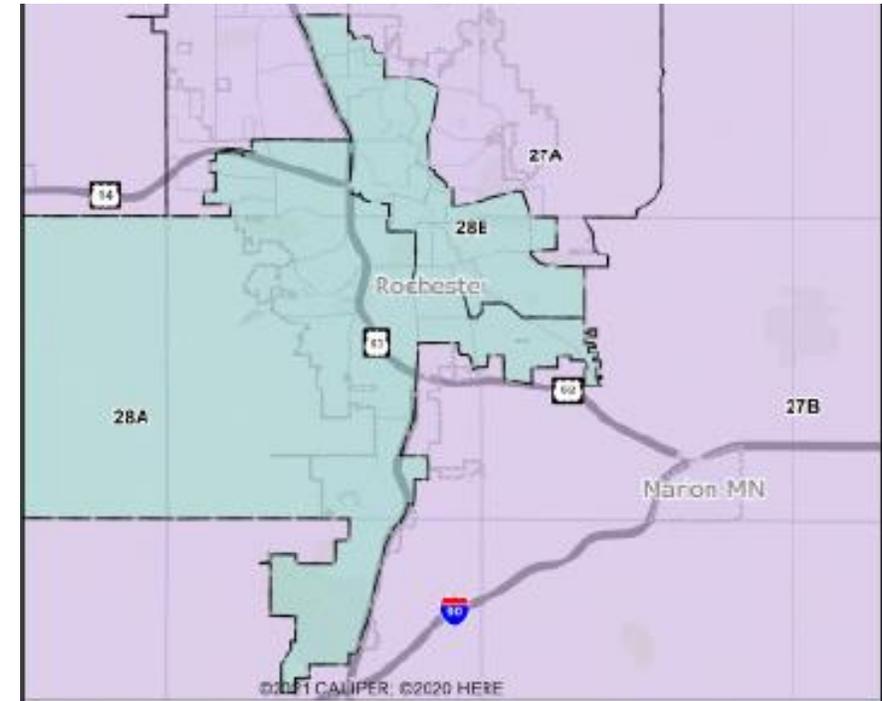
	Anderson	Corrie	Sachs	Wattson	Hippert
Minority Opportunity Districts (House) (Total Population)	34	32	36	31	15
Minority Opportunity Districts (Senate) (Total Population)	15	14	17	15	8
Majority-Minority Districts (House) (Total Population)	11	10	9	10	10
Majority-Minority Districts (Senate) (Total Population)	5	5	5	5	5

Corrie Plan's Rejection of the Panel's Criteria Results in Oddly Shaped Districts

Corrie St. Cloud Districts

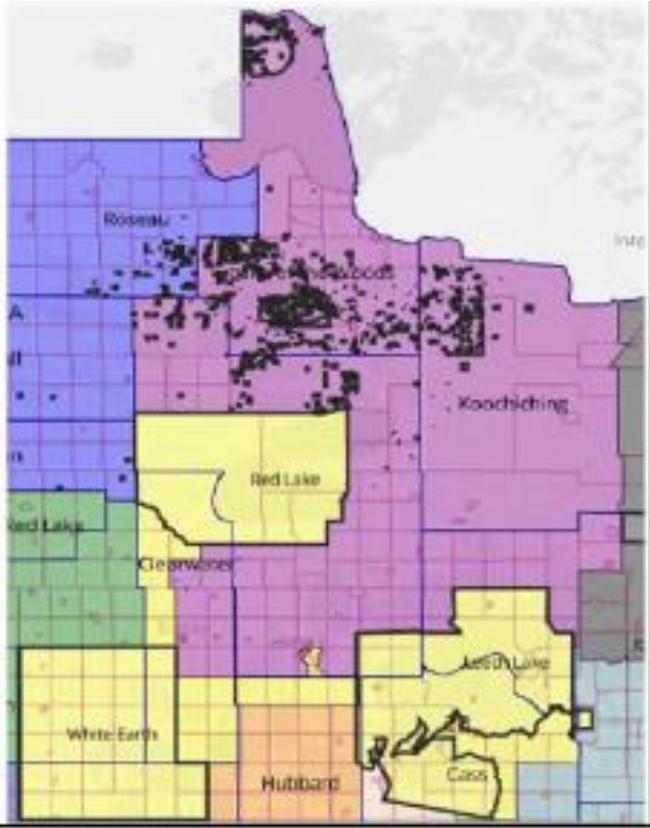


Corrie Rochester Districts

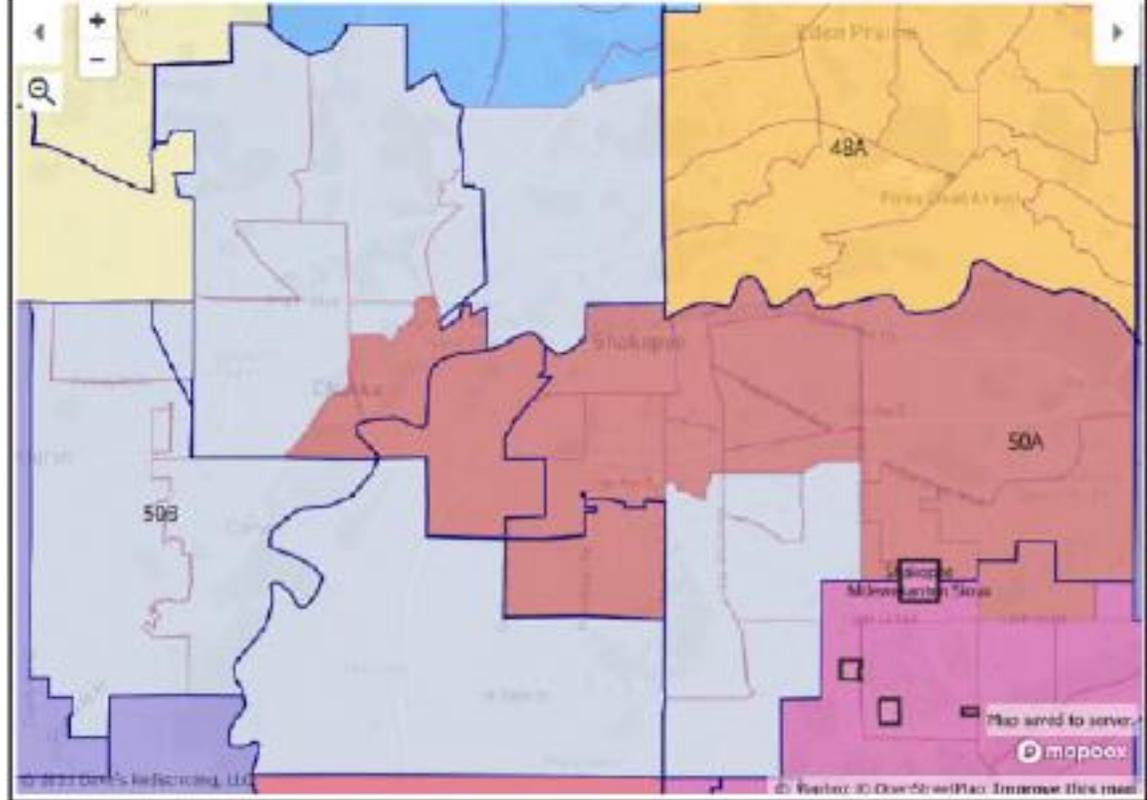


Corrie Plan's Rejection of the Panel's Criteria Results in Oddly Shaped Districts

Corrie House District 2B



Corrie House Districts 50A and 50B

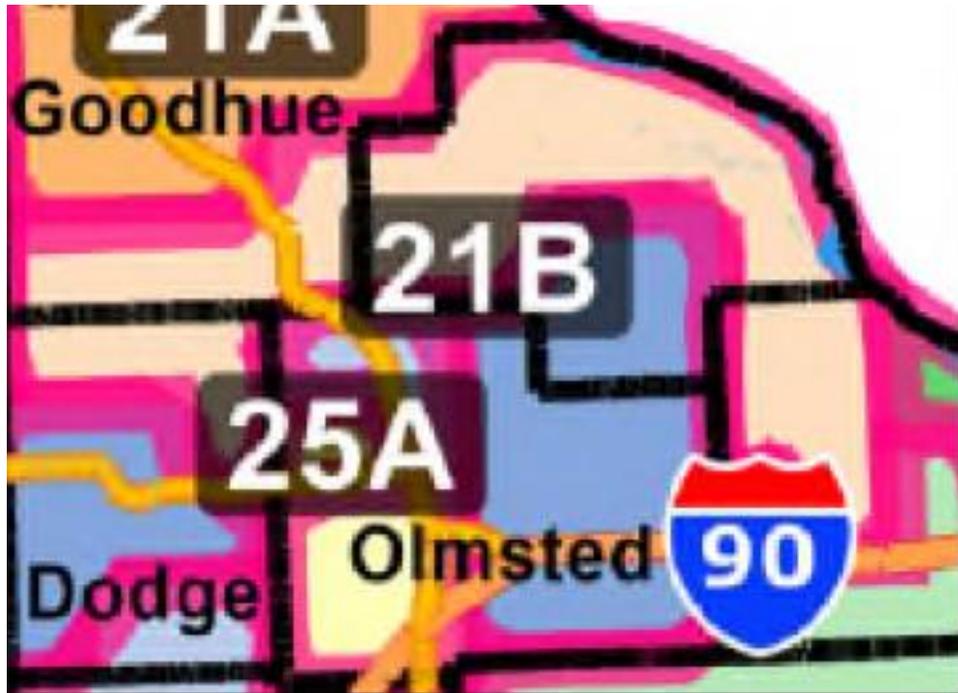


Sachs Plan Fails to Comply With the Panel's Criteria

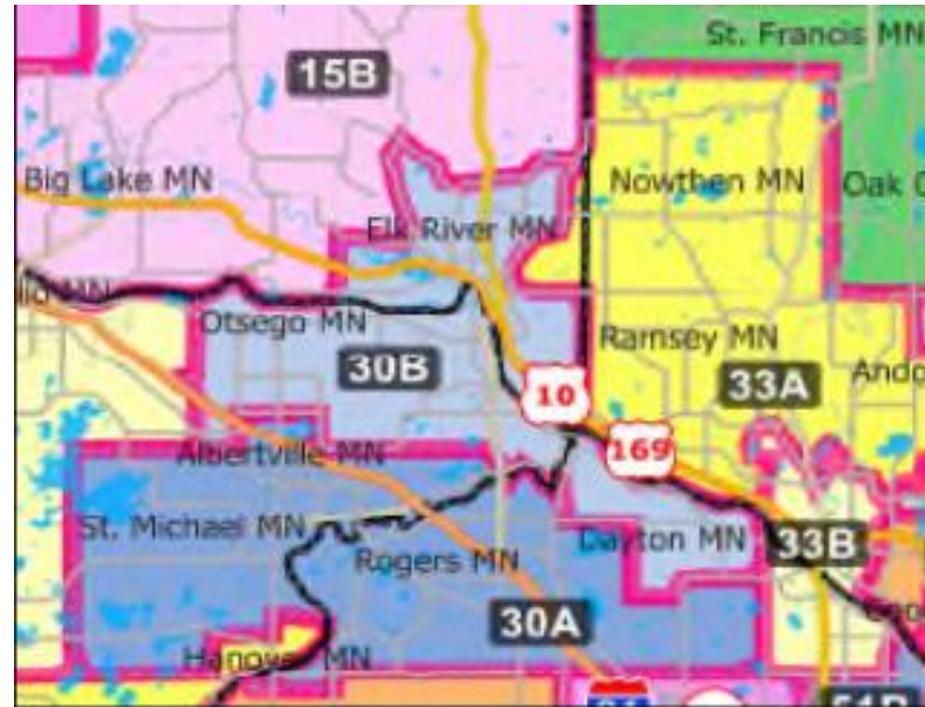
- Sachs unnecessarily divides political subdivisions while achieving similar population deviation metrics as Anderson
- Splits 25% more counties and 60.5% more cities and towns than Anderson in drawing house districts
- Splits 16% more cities and towns than Anderson in drawing senate districts
- Splits sixteen townships
- Anderson and Sachs mean population deviations are nearly equal
 - Both having a mean deviation of 0.56% for house districts
 - 0.45% to 0.42% mean deviations, respectively, for senate districts
- Like Corrie Plan, fails to provide materially better outcomes for minority representation

Sachs Plan's Unnecessary Political Subdivision Splits Result in Oddly Shaped Districts

Sachs House District 21B



Sachs House District 30B



Anderson Plan Complies With Panel's Criteria and Should Be Adopted

- Minimizes population deviations
- While maximizing the preservation of political subdivisions and American Indian Reservations
- Follows natural boundaries and is objective and defensible
- Results in fair and equitable districts for all Minnesotans